

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BARBARA ARANEDA,  
ANNE BURNS,  
HAYS ELLISEN,  
KATHLEEN O'REILLY,  
SANDY SANDERS,  
DAVID SEGAL,  
BRENDAN SEXTON,  
EDWARD SUGDEN,  
ELIZABETH WALSH,  
WEI-WEI WANG,  
BRIAN WEEKS,

Plaintiffs,

-versus-

THE CITY OF NEW YORK,  
NEREIDA CABASSA,  
PAUL DUNNE,  
BRIAN CHRISTOPHER,  
DAVID SONTZ,  
TIMOTHY CAI,  
DREW REPETTI,  
NOEL FLORES,  
SERGEANT GERALD FITZPATRICK,  
and DOES

Defendants.

ECF Case

05 Civ. 9738 (KMK)(JCF)

**MOTION TO ADMIT  
COUNSEL  
PRO HAC VICE**

2007 MAY 24 09:10 CR

CITY OF NEW YORK  
CLERK OF COURT

PURSUANT TO Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Norman Frederick Best, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

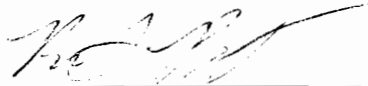
Applicant's name: SUSAN DOUGLAS TAYLOR  
Firm name: Law Office of Susan Douglas Taylor  
Address: 575 Madison Avenue, 10<sup>th</sup> floor  
City/State/Zip: New York, NY 10022  
Telephone/Fax: Phone: 212-605-0305, Fax: 212-873-0711

616502 #25 5-24-07

SUSAN DOUGLAS TAYLOR is a member in good standing of the Bar of the State of Washington and of Washington, District of Columbia. There are no pending disciplinary proceedings against Susan Douglas Taylor in any State or Federal courts.

Dated: May 22, 2007  
City, State: New York, New York

Respectfully submitted,



NORMAN FREDERICK BEST (NB 1968)  
575 Madison Avenue, 10<sup>th</sup> Floor  
New York, New York 10022  
(212) 671-0122

MICHAEL L. SPIEGEL (MS 0856)  
111 Broadway, Suite 1305  
New York, New York 10006  
(212) 587-8558

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

BARBARA ARANEDA,	)	<b>ECF Case</b>
ANNE BURNS,	)	
HAYS ELLISEN,	)	<b>05 Civ. 9738 (KMK)(JCF)</b>
KATHLEEN O'REILLY,	)	
SANDY SANDERS,	)	
DAVID SEGAL,	)	<b>AFFIDAVIT OF</b>
BRENDAN SEXTON,	)	<b>NORMAN FREDERICK</b>
EDWARD SUGDEN,	)	<b>BEST</b>
ELIZABETH WALSH,	)	<b>IN SUPPORT OF</b>
WEI-WEI WANG,	)	<b>MOTION TO ADMIT</b>
BRIAN WEEKS,	)	<b>COUNSEL</b>
	)	<b>PRO HAC VICE</b>
	)	
Plaintiffs,	)	
	)	
-versus-	)	
	)	
THE CITY OF NEW YORK,	)	
NEREIDA CABASSA,	)	
PAUL DUNNE,	)	
BRIAN CHRISTOPHER,	)	
DAVID SONTZ,	)	
TIMOTHY CAI,	)	
DREW REPETTI,	)	
NOEL FLORES,	)	
SERGEANT GERALD FITZPATRICK,	)	
and DOES	)	
Defendants.	)	

-----X

State of New York     )  
                              )  
County of New York    )     ss:

Norman Frederick Best, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Barbara ARANEDA and all other Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion

CITY OF NEW YORK  
CLERK OF COURT  
2007 MAY 24 5:01 PM '07

to admit Susan Douglas Taylor as counsel *pro hac vice* to represent Plaintiffs in this matter.

2. I am a member in good standing of the bars of the states of New York and Washington.

I was admitted to practice law in New York state on November 21, 2003. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this court.

3. I have known Susan Douglas Taylor since 1991.

4. Ms. Taylor is an attorney in sole practice at 575 Madison Avenue, 10<sup>th</sup> floor, New York, NY 10022.

5. I have found Ms. Taylor to be a skilled attorney, and a person of integrity. She has experience with Federal practice, and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Susan Douglas Taylor, *pro hac vice*.


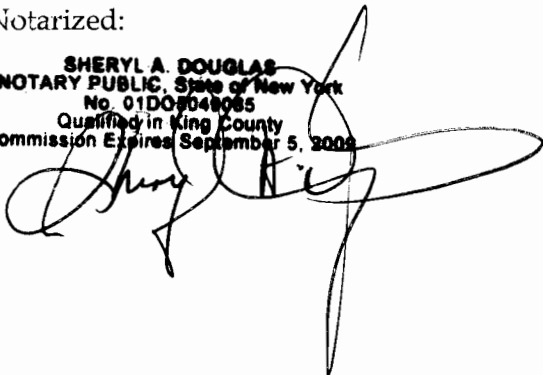
7. I respectfully submit a proposed order granting the admission of Susan Douglas Taylor, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Susan Douglas Taylor, *pro hac vice*, to represent Plaintiffs in the above captioned matter, be granted.

Dated: May 22, 2007  
City, State: New York, New York

Notarized:

**SHERYL A. DOUGLAS**  
NOTARY PUBLIC, State of New York  
No. 01DO5049085  
Qualified in King County  
Commission Expires September 5, 2009

  
Norman Frederick Best, Esq.  
[NB 1968]

**IN THE SUPREME COURT OF THE STATE OF WASHINGTON**

IN THE MATTER OF THE ADMISSION

BAR # 13397

OF

**CERTIFICATE OF GOOD**

SUSAN DOUGLAS TAYLOR

**STANDING**

TO PRACTICE IN THE COURTS OF THIS STATE.

I, Ronald R. Carpenter, Clerk of the Supreme Court of the State of Washington, hereby certify

SUSAN DOUGLAS TAYLOR

was regularly admitted to practice as an Attorney and October 12, 1983, and is now and has been continuously since that date an attorney in good standing in said Court.



IN TESTIMONY WHEREOF, I have  
hereunto set my hand and affixed  
the seal of said Court this  
26<sup>th</sup> day of April, 2007

A handwritten signature in black ink, appearing to read "Ronald R. Carpenter", written in a cursive style.

RONALD R. CARPENTER

SUPREME COURT CLERK

WASHINGTON STATE SUPREME COURT



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

SUSAN DOUGLAS TAYLOR

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was on the 6<sup>TH</sup> day of NOVEMBER, 1998  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on May 4,  
2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BARBARA ARANEDA,  
ANNE BURNS,  
HAYS ELLISEN,  
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and DOES

Defendants.

ECF Case

05 Civ. 9738 (KMK)(JCF)

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

2007 MAY 21 00:10:17

CITY OF NEW YORK

Upon the motion of Norman Frederick Best, counsel for Barbara ARANEDA and all other Plaintiffs in the above captioned action, and said sponsor attorney's Affidavit in support, IT IS HEREBY ORDERED that

Applicant's name: SUSAN DOUGLAS TAYLOR

Firm name: Law Office of Susan Douglas Taylor

Address: 575 Madison Avenue, 10<sup>th</sup> floor

City/State/Zip: New York, NY 10022

Telephone/Fax: Phone: 212-605-0305, Fax: 212-873-0711

Email address: st@susandouglastaylor.com

is admitted to practice *pro hac vice* as counsel for Barbara ARANEDA and all other Plaintiffs in the above captioned action in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: This \_\_\_\_ day of May, 2007  
City, State: New York, New York

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James C. Francis IV  
United States Magistrate Judge